

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

VALERIE ANDERSON, individually and
on behalf of all others similarly situated,

Plaintiff,

v.

FORTRA LLC,

Defendant.

Case No. 23-cv-00533 (SRN/DTS)

**PLAINTIFFS’ MOTION TO APPOINT INTERIM CO-LEAD COUNSEL AND
EXECUTIVE COMMITTEE COUNSEL UNDER FED. R. CIV. P. 23(g)(3)**

Plaintiffs Valerie Anderson, Robert Taylor, Edward Hubler, Muhammed Zahid, Alauntae Butts, Marquese York, Tara Hartzel Vancosky, Brett Yonally, Branton Underwood, K.U. (minor) through Branton Underwood, Irida Gonzalez, and Linda Caudill (“Plaintiffs”), individually and on behalf of all others similarly situated, submit this Memorandum of Law in support of Plaintiffs’ Motion to Appoint Interim Co-Lead Counsel and Executive Committee Counsel under Fed. R. Civ. P. 23(g)(3). Plaintiffs respectfully request the Court appoint Bryan L. Bleichner (Chestnut Cambronne PA) and Brian C. Gudmundson (Zimmerman Reed LLP) as Interim Co-Lead Class Counsel. Plaintiffs also respectfully request the Court appoint Executive Committee Counsel, composed of Nathan D. Prosser (Hellmuth & Johnson PLLC) as Chair of the Executive Committee, Joseph M. Lyon (The Lyon Firm, LLC), Danielle L. Perry (Mason LLP), Dylan J. Gould (Markovits, Stock & DeMarco, LLC), David A. Goodwin (Gustafson Gluek PLLC), Gary M. Klinger

(Milberg Coleman Bryson Phillips Grossman PLLC), John G. Emerson (Emerson Law Firm, PLLC), Barton D. Cohen (Bailey & Glasser, LLP), Karen Hanson Riebel (Lockridge Grindal Nauen, P.L.L.P.), John A. Yanchunis (Morgan & Morgan Complex Litigation Group), and Kenneth J. Grunfeld (Golomb Spirt Grunfeld P.C.).

This Motion is based upon the Memorandum of Law and the Declaration of Bryan L. Bleichner and attached Exhibits filed contemporaneously with this Motion, and upon all other files, records, and proceedings in this matter.

Respectfully submitted,

Dated: April 11, 2023

/s/ Bryan L. Bleichner

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